

1 LABONI A. HOQ (SBN 224140)
2 *laboni@hoqlaw.com*
HOQ LAW APC
3 P.O. Box 753
South Pasadena, California 91030
4 Telephone: (213) 973-9004

5 EVA BITRAN (SBN 302081)
ebitran@aclusocal.org
6 ACLU FOUNDATION OF SOUTHERN CALIFORNIA
1313 West Eighth Street
7 Los Angeles, California 90017
Telephone: (213) 977-9500
Facsimile: (213) 915-0219

8 Attorneys for Plaintiff
9 (*additional counsel information on next page*)

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 AMERICAN CIVIL LIBERTIES
13 UNION FOUNDATION OF
14 SOUTHERN CALIFORNIA,

15 *Plaintiff,*

16 v.

17 UNITED STATES IMMIGRATION
18 AND CUSTOMS ENFORCEMENT,
UNITED STATES DEPARTMENT
OF HOMELAND SECURITY,

19 *Defendants.*

20 Case No. 2:22-CV-04760-SHK

21 **PLAINTIFF'S NOTICE TO COURT**
22 **REGARDING SCHEDULING**
23 **ORDER**

1 EUNICE CHO (*pro hac vice*)
2 *echo@aclu.org*
3 AMERICAN CIVIL LIBERTIES UNION FOUNDATION
NATIONAL PRISON PROJECT
915 Fifteenth Street NW, 7th Floor
Washington, DC 20005
4 Telephone: (202) 548-6616

5 KYLE VIRGIEN (SBN 278747)
kvirgien@aclu.org
6 AMERICAN CIVIL LIBERTIES UNION FOUNDATION
NATIONAL PRISON PROJECT
7 425 California St., Suite 700
San Francisco, CA 94104
8 Telephone: (202) 393-4930

9 *Attorneys for Plaintiff*

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 On January 24, 2025, the Court set out a Briefing Schedule for Cross-Motions
2 for Summary Judgment as to claims against Defendant Immigration and Customs
3 Enforcement (“ICE”) in this Freedom of Information Act (“FOIA”) case. ECF No.
4 111 (Order).

5 After the issuance of the Court’s Order, Plaintiff provided a list of documents
6 to ICE for inclusion in a *Vaughn* Index. ICE thereafter provided a copy of a *Vaughn*
7 Index, and soon after provided a supplemental production of documents that lifted
8 redactions specified for potential challenge by Plaintiff. As a result, Plaintiff
9 respectfully writes to inform the Court that it does not intend to file a Motion for
10 Summary Judgment to challenge ICE’s withholding and redactions in its production
11 of documents thus far under FOIA.

12
13
14 Respectfully submitted this April 30, 2025.

15 /s/ Laboni A. Hoq

16 17 18 19 20 21 22 23 24 25 26 27 28	LABONI A. HOQ (SBN 224140) laboni@hoqlaw.com HOQ LAW APC P.O. Box 753 South Pasadena, California 91030 Telephone: (213) 973-9004	EUNICE CHO (pro hac vice) echo@aclu.org AMERICAN CIVIL LIBERTIES UNION FOUNDATION NATIONAL PRISON PROJECT 915 Fifteenth Street NW, 7th Floor Washington, DC 20005 Telephone: (202) 548-6616
	EVA BITRAN (SBN 302081) ebitran@aclusocal.org ACLU FOUNDATION OF SOUTHERN CALIFORNIA 1313 West Eighth Street Los Angeles, California 90017 Telephone: (213) 977-9500 Facsimile: (213) 915-0219	KYLE VIRGIEN (SBN 278747) kvirgien@aclu.org AMERICAN CIVIL LIBERTIES UNION FOUNDATION NATIONAL PRISON PROJECT 425 California St., Suite 700 San Francisco, CA 94104 Telephone: (202) 393-4930 <i>Attorneys for Plaintiff</i>